

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 24-cv-4775 (ER)

JANE DOE 200,

Plaintiff,

vs.

DARREN K. INDYKE AND RICHARD
D. KAHN AS CO-EXECUTORS OF
THE ESTATE OF JEFFREY E. EPSTEIN,

Defendant.

/

**PLAINTIFF'S SECOND REQUEST FOR PRODUCTION TO DEFENDANT, THE
ESTATE OF JEFFREY E. EPSTEIN, FOR ALL DOCUMENTS RELATED TO
FEDERAL RULE 415 EVIDENCE**

Plaintiff, **Jane Doe 200**, by and through the undersigned attorneys, and pursuant to Federal Rules of Civil Procedure 26 and 34, and associated local rules, requests the Defendant, **Darren K. Indyke and Richard D. Kahn as Co-Executors of the Estate of Jeffrey E. Epstein** (“**Estate of Epstein**”) to produce the following documents to the offices of **Edwards Henderson, 425 North Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301**, within the time and manner prescribed by law pursuant to the applicable Rules of the Federal Rules of Civil Procedure.

DEFINITIONS

1. The term "documents" means and includes, without limitation, all writings of any kind, including the originals and all non-identical copies or drafts, whether different from the original by reason of any notation made on such copy or draft or otherwise including, without limitation, correspondence, memoranda, notes, diaries, statistics, letters, e-mail, electronic computer files, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice communications, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets and all drafts, alterations,

modifications, changes, and amendments of any of the foregoing, graphic or aural wris, records or representations of any kind including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes and disc recordings, and writings and printed material of every kind, whether or not the document is out of your possession, custody or control.

2. The term “sexual assault” means a crime under federal law or under state law (as “state” is defined in 18 U.S.C. § 513) involving:

- Any conduct prohibited by 18 U.S.C. chapter 109A;
- Contact, without consent, between any part of the Defendant’s body – or an object – and another person’s genitals or anus;
- Contact, without consent, between the defendant’s genitals or anus and any part of another person’s body;
- Deriving sexual pleasure or gratification from inflicting death, bodily injury, or physical pain on another person; or
- An attempt or conspiracy to engage in conduct described in any of the above.

INSTRUCTIONS

1. Any document that may reveal the identity of a victim of a sexual assault as defined above can be produced in a format that redacts the identity or overlays the identity with a pseudonym.

2. If any responsive documents exist over which there is a claim of privilege, provide sufficient details for the Court to determine whether the crime-fraud or other exception applies.

DOCUMENTS REQUESTED

1. Produce all documents related to any sexual assault that Jeffrey E. Epstein committed or has been alleged to have been committed between January 1, 1995 through August 10, 2019.
2. Produce all documents provided to Jeffrey E. Epstein or the Estate of Jeffrey E. Epstein in support of any claim of sexual abuse on behalf of any alleged victim of sexual assault alleged to have been committed by Jeffrey E. Epstein. This Request encompasses all documents that were provided to Jeffrey Epstein or his attorneys while he was alive, or documents provided to the Estate of Jeffrey E. Epstein or the co-executors after he died.
3. Produce all documents related to any sexual assault committed by or alleged to have been committed by Jeffrey E. Epstein.

4. Produce all documents evidencing payments made to each alleged victim for the purpose of full or partial settlement of any lawsuit alleging sexual assault or claim of sexual assault by Jeffrey E. Epstein.
5. Produce all documents exchanged in the lawsuits or claims that resulted in settlement payments referenced in Request 4, between any alleged victim of Jeffrey E. Epstein's sexual assaults or her representative and Jeffrey E. Epstein or the Estate of Jeffrey E. Epstein or any representative thereof. This Request includes but is not limited to demand letters, responses to demand letters, complaints, discovery production, responsive documents including electronic communications between Jeffrey E. Epstein and any alleged victim, and any documents prepared by Jeffrey E. Epstein or the Estate of Jeffrey E. Epstein, that was provided to a mediator or counsel for the alleged sexual assault victim either in support or defense of the referenced sexual assault claim.
6. Produce all documents in the possession, custody, or control of the Estate of Jeffrey E. Epstein that support allegations that Jeffrey E. Epstein committed any sexual assaults or child molestations.
7. Produce all electronic communications between Jeffrey E. Epstein and any female who ever claimed Jeffrey E. Epstein committed a sexual assault against her. This request is not limited to only those communications making claims of sexual assault but instead requests the production of all communications between Jeffrey E. Epstein on the one hand and the individual who at some point claimed Jeffrey E. Epstein committed sexual assault against her on the other hand.
8. Provide all charts or summaries that provide any of the following information: the number of sexual assault victims who made claims of sexual assault against Jeffrey E. Epstein or his Estate, the allegations of any such claim inclusive of location and time frame of the alleged assault(s), any determination on the validity of the claim, any monetary payment amount made to settle the claim, and the date of any such payment.
9. All documents evidencing any protocol utilized by the Co-Executors of the Estate of Jeffrey E. Epstein to determine the validity of any sexual assault claim against Jeffrey E. Epstein and the determination of the amount of any payment to settle the claim.
10. Produce all documents in which allegations or claims of sexual assault, facilitation of sexual assault, conspiracy to commit sexual assault, claims of sex-trafficking or the facilitation of sex trafficking, has been made against Darren Indyke or Richard Kahn. This request requires the production of responsive documents irrespective of whether the allegations were made in a lawsuit, pre-suit claim or otherwise.
11. Produce all documents in support or defense of allegations of sexual assault against Jeffrey E. Epstein stemming from the Florida State or Federal investigations that resulted in his arrest including, *State of Florida v. Jeffrey Epstein*, Case No. 06-CF009454-AMB; *State of Florida v. Jeffrey Epstein*, Case No. 09-CV009381-AMB.

12. Produce all documents in support or defense of the allegations of sexual assault against Jeffrey E. Epstein stemming from the federal investigation that resulted in his arrest; *United States of America v. Jeffrey Epstein*, Case No. 19-CR-490-RMB.
13. Produce all documents authored by Jeffrey E. Epstein while he was in Federal Custody on sex-trafficking charges in 2019.
14. Produce all documents evidencing any changes or modifications to Jeffrey E. Epstein's will or trust documents between November 2018 and his arrest on federal sex-trafficking charges in July 2019.
15. Produce all documents that have been produced by Darren K. Indyke, Richard D. Kahn, or the Estate of Jeffrey E. Epstein with respect to the litigation in *Doe 3 v. Darren K. Indyke & Richard D. Kahn*, Case No. 24-CV-1204 (AS).
16. Produce all documents listing the names and total number of sexual assault victims that are alleged to have been sexually assaulted by Jeffrey Epstein.
17. Produce all documents that either support or refute the alleged sexual assaults of the victims identified in response to Request 16 above.
18. Produce all electronic communications between Jeffrey E. Epstein and any female who ever received a settlement payment for any alleged sexual assault committed by Jeffrey E. Epstein.
19. Produce all promissory notes made by Jeffrey E. Epstein with any alleged victim of sexual assault.
20. Produce all audio or video recordings of Jeffrey E. Epstein in the company of any female.
21. Produce all audio or video recordings depicting any alleged sexual assault victim of Jeffrey E. Epstein.
22. Produce all audio or video recordings that depict Jeffrey E. Epstein engaging in any sexual act.
23. Produce all material derived from or created for the purpose of investigating any claim of sexual assault made against Jeffrey E. Epstein or the Estate of Jeffrey E. Epstein.
24. All documents evidencing any admission of guilt made by Jeffrey E. Epstein regarding sexual assault.
25. Produce all Non-Disclosure Agreements (NDA's) that reference Jeffrey E. Epstein, Ghislaine Maxwell or any Jeffrey E. Epstein related properties or employment.

26. Produce all documents evidencing changes or modifications to Jeffrey E. Epstein's will or trust documents from the time he was arrested in July 2019 and the time of his death in August 2019.
27. Produce all documents explaining or describing the criteria or reasoning for Jeffrey E. Epstein's determination of who to include as beneficiaries of the 1953 trust.
28. Produce all documents evidencing the identities of the beneficiaries of Jeffrey E. Epstein's Estate.
29. Produce all documents evidencing all outgoing wire transfers greater than \$1,000,000.00 from Jeffrey E. Epstein or any company owned or controlled by Jeffrey E. Epstein between November 1, 2018, through and including August 10, 2019.

Dated: February 25, 2025

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that on February 25, 2025, the foregoing document is also being served on this day on all counsel of record via email transmission.

/s/ Bradley J. Edwards
Bradley J. Edwards

SERVICE LIST

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